TABLE IV

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PART 90 SERVICES LOCATED AT SITE PROPOSED BY FOUR JACKS BROADCASTING, INC. N 39-17-13 W 76-45-16

CALLSIGN RADIO_SRVS FREQUENC STREET ADDRESS PWR-OUT ERP GND-ELE ANT	CITY	ST ZIP	LAT-DEG ATTENTION	LAT-MIN	LAT-SEC	LON-DEG LON-MIN PHONE	LON_SEC
WNKM913 YS 937.2750 814 HOLLY DR E 150.00000 350.00000 540 550	HARFORD SMR INC ANNAPOLIS 772 FB2C	MD 214010000	39	17	13	76 45 3019740975	16
WNKM913 YS 937.2875 814 HOLLY DR E 150.00000 350.00000 540 550	HARFORD SMR INC ANNAPOLIS 772 FB2C	MD 214010000	39	17	13	76 45 3019740975	16
WNKM913 YS 937.3000 814 HOLLY DR E 150.00000 350.00000 540 550	HARFORD SMR INC ANNAPOLIS 772 FB2C	MD 214010000	39	17	13	76 45 30197 4 0975	16
WNKM913 YS 937.3125 814 HOLLY DR E 150.00000 350.00000 540 550	HARFORD SMR INC ANNAPOLIS 772 FB2C	MD 214010000	39	17	13	76 45 3019740975	16
WNKM913 YS 937.3250	HARFORD SMR_INC		39	17	13	76 45	16

TABLE IV

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PART 90 SERVICES LOCATED AT SITE PROPOSED BY FOUR JACKS BROADCASTING, INC. N 39-17-13 W 76-45-16

CALLSIGN RADIO_SRVS FREQUENCES STREET ADDRESS PWR-OUT ERP GND-ELE ANT	CITY -HGT HAAT	ST ZIP	ATTENTION			LON-DEG LON-MIN PHONE	LON_SEC
WNKM913 YS 937.3625	HARFORD SMR INC		39	17	13	76 45	16
814 HOLLY DR E		MD 214010000				3019740975	
150.00000 350.00000 540 550	772 FB2C						
WNKM913 YS 937.3750	HARFORD SMR INC		39	17	13	76 45	16
814 HOLLY DR E		MD 214010000				3019740975	
150.00000 350.00000 540 550	772 FB2C						
WNXM924 IB 929.1125	HARTER, R PHILIP: EASTON	, A T:EASTON,	S D 39	17	13	76 45	16
1312 ACADEMY CT	BELMONT	CA 940020000	R PHILIP HARTE	R		4153497800	
300.00000 600.00000 540 550	774 FB						
KYC489 IB 496.1625	I & R EQUIPMENT CORPORA	TION	39	17	13	76 45	16
5681 MAIN ST						3017963200	
110.00000 106.00000 540 550	772 FB4						
KNR529 IB 495.9375	L AND L SUPPLY CORPORAT	ION	39	17	13	76 45	16
1404 FRONT AVE	LUTHERVILLE	MD 21093				3018257800	
75.00000 375.00000 540 550	772 FB4						
KNR529 IB 498.9375	L AND L SUPPLY CORPORAT	ION	39	17	13	76 45	16
1404 FRONT AVE	LUTHERVILLE	MD 21093				3018257800	
59.00000 148.00000 540 550	772 MO						
KAS454 LV 452.6250	MARYLAND, STATE OF		39	17	13	76 45	16
BALTIMORE WASHINGTON INTL ARPRT	BALTIMORE	MD 21240	STATE AVIATION	ADMINIST	RATION	3018597018	
50.00000 0.00000 540 550	O FB						

TABLE IV

Page No. 12

PART 90 SERVICES LOCATED AT SITE PROPOSED BY FOUR JACKS BROADCASTING, INC. N 39-17-13 W 76-45-16

CALLSIGN RADIO_SRVS FREQUENC STREET ADDRESS PWR-OUT ERP GND-ELE ANT	CITY	ST ZIP		MIN LAT-SEC	LON-DEG LON-MIN PHONE	LON_SEC
	MARYLAND, STATE OF BWI AIRPORT 762 MO	MD 212400000		17 13 INISTRATION	76 4 5 3018597022	16
WNHW417 GP 853.2625 POB 8766 90.00000 232.00000 540 550	MARYLAND, STATE OF BWI AIRPORT 762 FB2	MD 212400000	39 STATE AVIATION ADM	17 13 INISTRATION	76 45 3018597022	16
WNKI472 GO 853.6125 806 15TH ST NW 70.00000 355.00000 540 550	WASHINGTON	DC 200050000		17 13	76 45 2023477333	16
WNJY741 GB 860.7875 3514 BASLER RD 70.00000 75.00000 540 550	HAMPSTEAD	MD 210740000	39	17 13	76 4 5 3012398006	16
WNLX972 GO 807.0625 POB 1216 35.00000 51.00000 540 700	OVERNITE TRANSPORTATION RICHMOND 922 MO	COMPANY VA 232090000	_ 	17 13	76 45 3017968550	16
WNLX972 GO 852.0625 POB 1216 75.00000 55.00000 540 700	OVERNITE TRANSPORTATION RICHMOND 922 FB2	COMPANY VA 232090000	39	17 13	76 4 5 3017968550	16
KNA585 IB 495.9375 6600 HARFORD RD 75.00000 375.00000 540 550	SMITH REFRIGERATION INC BALTIMORE 772 FB2	MD 21214	39	17 13	76 45	16

TABLE IV

Page No. 13

PART 90 SERVICES LOCATED AT SITE PROPOSED BY FOUR JACKS BROADCASTING, INC. N 39-17-13 W 76-45-16

CALLSIGN RADIO_SRVS FREQUENCY STREET ADDRESS PWR-OUT ERP GND-ELE ANT-	CITY ST	r ZIP	LAT-DEG ATTENTION	LAT-MIN	LAT-SEC	LON-DEG LON-MIN PHONE	LON_SEC
KNJU848 GB 853.1375 1150 15TH ST NW 70.00000 250.00000 540 550	WASHINGTON DO	200710000	39 JIMMY SPRINKLI	17 G	13	76 45 2023347707	16
KZU643 IB 498.9375 1025 CONNECTICUT AVE NW STE 506 50.00000 150.00000 540 550	WASHINGTON DO		NC 39 R C BENEDICT	17	13	76 45 3017654030	16
KZU643 IB 495.9375 1025 CONNECTICUT AVE NW STE 506 50.00000 150.00000 540 550	··		NC 39 R C BENEDICT	17	13	76 45 3017654030	16
KZU643 IB 495.9375 1025 CONNECTICUT AVE NW STE 506 75.00000 376.00000 540 550	WESTINGHOUSE COMMUNICATION WASHINGTON DO 772 FB2		R C BENEDICT	17	13	76 45 3017654030	16



VLISSIDES ENTERPRISES, INC.

County of Fairfax State of Virginia

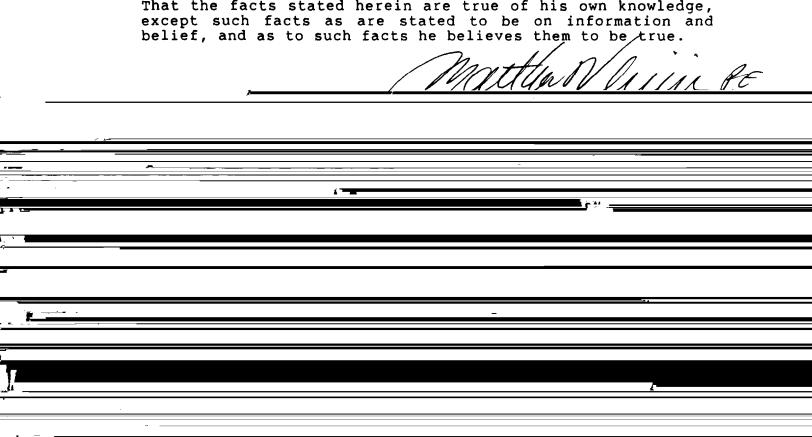
Matthew J. Vlissides, being duly sworn upon his oath, deposes and states that:

He is a graduate Civil/Structural Engineer, a Registered Professional Engineer in the District of Columbia, State of Maryland, State of Virginia and forty four other States, and is the Owner of Vlissides Enterprises, Inc. specializing in tall tower design and construction, with offices at 7601 Burford Drive, McLean, VA 22102;

That his qualifications are a matter of record in the Communications Industry and in the Federal Communications Commission;

That the attached engineering reports were prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge,



VLISSIDES ENTERPRISES, INC.

ENGINEERING STATEMENT

SCRIPPS HOWARD BROADCASTING COMPANY

This engineering statement has been prepared on behalf of Scripps Howard Broadcasting Company ("Scripps"), licensee of WMAR-TV, Channel 2, Baltimore, Maryland in support of its petition to deny the application filed by Four Jacks Broadcasting, Inc. ("FJB"), FCC File No. BPCT-910903KE. The FJB application seeks a construction permit for a new television station to serve Baltimore, Maryland on Channel 2 + (54-60 MHz) with an effected radiated power (ERP) of 100 kW (H&V) and 267 meters antenna height above average terrain. FJB proposes operation from an existing tower currently utilized by WPOC(FM) located at the geographic coordinates:

North Latitude: 39° 17′ 13" West Longitude: 76° 45′ 16"

The FJB application should be returned since the tower, if used as proposed, is unsafe.

Tower Structure Suitability

Mr. Herman E. Hurst, Jr.'s statement in support of an opposition to a petition to deny an application for a new television broadcast station in Baltimore, Maryland FCC File No. BPCT-910903KE; And in particular in Page 2 under paragraph 2. Site Suitability Issue is incorrect. Mr. Hurst, engineer who is not a Registered Professional Engineer under any engineering discipline, and who has no formal or even practical training and experience in Structural Analysis, Fabrication and Construction of tall, medium or short Communications Towers attempts to make critical evaluations of my Technical Statement and Structural Computer Analysis for the Four Jacks Broadcasting, Inc. 666 ft. Guyed Tower. Mr. Hurst's assertions are uneducated, unprofessional, erroneous,

inappropriate for the following reasons: All of my assumptions regarding the characteristics of the tower structural system are based on exhaustive study of the structure through personal observations with the use of high power binoculars, high power surveying instruments, large number of photographs taken from short distance with high power lenses, thirty years of experience in dealing with thousands of communications towers' design, analysis, fabrication, installation, inspection and overall construction. In making my assumptions concerning the characteristics of the tower structural system, I was very careful in giving the opposition every possible advantage, i.e.,

- a) I assumed that all structural members on the tower (tower legs, horizontals and diagonals) are made of 50,000 psi high-strength steel, which is very questionable. It is more probable that the steel used for the tower legs is 35,000 psi ASTM A53 pipe and for the diagonals and horizontals ASTM A36 solid bars.
- b) Examining the tower photographs presented in my tower analysis report, it is obvious that at the top of the tower is the skeleton of a ten bay FM antenna without radiating elements or with very small radiating elements. Because I was not very sure about the type of antenna I totally disregarded this significant antenna load and I did not include it in the tower analysis.
- c) The geometry of the tower was carefully measured through surveying instruments and the panel height, type and diameter of the tower leg was verified during these optical measurements.
- d) Mr. Hurst on Page 9 of his statement wrongly attests that twenty-three transmission lines were assumed to traverse the tower over the entire distance to each antenna. The truth is that twenty-two transmission lines total were used to feed the various indicated antennas, one conduit for the tower obstruc-

tion lights and the tower ladder. All transmission lines did not traverse the tower over the entire distance. Furthermore, in computing the wind load on the transmission lines, I assumed that eight transmission lines, the conduit and the tower ladder have 100% effective projected area to the wind; four transmission lines have 75% effective projected area to the wind; three transmission lines have 50% effective projected area to the wind; six transmission lines have 25% effective projected area to the wind; and the remaining one transmission line has 0% effective projected area to the wind; thus achieving certain transmission line bundling effect even though the actual transmission lines on the tower are not bundled (See Photographs).

- e) Mr. Hurst virtually ends his critique by stating that my analysis fails to reflect the fact that lines are bundled into a single cylindrical vertical run up the tower. This is an outright misrepresentation of the existing condition and it is easy to see it by examining the pictures of the tower presented in my analysis report. In any case in paragraph (g) it is proven that bundling does not make the tower capable of accepting the Channel 2 antenna and even one 3-1/8 inch rigid transmission line.
- f) Mr. Hurst states no information on transmission lines is included on the Land Surveyor's report. This is true. I picked up the antenna elevations and transmission lines from direct observations and photographs and I verified the antenna elevations by using the land surveyor's report.
- g) Mr. Hurst states that Vlissides incorrectly assumes that the proposed Channel 2 antenna will require two 3-1/8 inch rigid transmission lines. I strongly believe that the assumption is correct and in accordance with good engineering practice. The only justification for Mr. Hurst to plan a low reliability antenna system is to squeeze costs and to support of FJB's

contention that the tower is safe. However, Mr. Hurst's effort to help the tower situation was destined to fail. Attached is a second revision of the tower analysis where the two 3-1/8 inch rigid transmission lines have been reduced to one 3-1/8 inch Line The balance of the twenty-one trapmingion line have Therefore, Mr. Hurst's plan to use one 3-1/8 inch rigid transmission line and to bundle all small lines in one impractical bundle did not help the tower situation as far as Four Jacks Broadcasting, Inc. is concerned. Still, 30% of the tower leg sections are overstressed from 0.1 to 67.7%. This coupled with the column buckling evaluation parameter for the tower (shown in my previous analysis) calculated at over 1.5 renders the subject tower unsafe for installing the Channel 2 antenna and one 3-1/8 inch transmission line.

h) In continuation of my policy of giving the opposition every possible break, I increased the allowable stress for all structural members of the tower by 33%. EIA/TIA Standard 222-E

Antenna Design Parameters

HeightWeight IncludingShearOverturningBase Support FrameMoment

104 ft. 17,000 lbs. 8900 lbs. 393,000 ft-lbs

- k) On Page 6 of the Opposition to Petition to Deny Application the Four Jacks Broadcasting attorney takes a cheap shot against the disclaimer on my Analysis Report. This disclaimer is a standard clause required by the Insurance Company. I stand behind my statements and findings and this waiver of liability is a standard clause and does not detract from my findings.
- 1) The \$350,000.00 engineering estimate for the cost of building a new tower is not an inflated figure; rather, it is a conservative estimate.
- m) Based on all the previous statements and the new Structural Computer Tower Analysis (Attached), it is my engineering opinion that, due to the large overstresses calculated in the tower legs, and the large colum buckling evaluation parameter (PHI), even though I gave every possible break to the tower, the subject tower is not adequately designed to support the Channel 2 antenna and its transmission line. Therefore, the subject tower must not be used for the installation of the Channel 2 antenna.

MATTHEW J. VLISSIDES, P.E. ENGINEERING CONSULTANT

Mr. Matthew J. Vlissides, an Engineering Consultant, has over 30 years of experience in structural and mechanical engineering and is a specialist in antenna and tower design, fabrication supervision and installation.

During the past twenty years he has performed extensive successful consulting work in the area of communications for L.T.V. Electrosystems, Inc., Comsat Corporation, Northrop-Page Communications Engineers, Inc., NASA Goddard Space Flight Center, ITT-SPC, COSMOS Engineers, Inc., Stainless, Inc., Bechtel Corporation, MCI, Microflect Company, Inc., R.F. Systems, Inc., Telcom, Inc., DCA, Coast Guard, Plessey, Ltd., Burleson Associates, Inc., E-Systems, Inc., RCA, Fairchild Space & Electronics, Inc., David L. Steel, Sr., P.E., Harris International, RCA Global, RMS, Sanders Associates, T-CAS, TELCOM, Teleconsult, Intelsat, numerous Broadcasting Stations throughout the USA, and others.

Prior to establishing his Engineering Business, Mr. Vlissides was chief structural engineer for Northrop-PAGE where he was responsible for the analysis, design, specification writing and fabrication supervision of advanced structures, such as self-supporting and guyed communication towers, antennas, tracking stations, radio telescopes and structures for the space communications program. He was instrumental in the development of the 42' antenna transportable commercial station operated by Comsat, and in the design of the wheel and track antenna and the integrated two-story building with antenna on top, utilized by LTV Aircraft Company.

Mr. Vlissides has participated in the successful engineering and implementation of several multimillion dollar projects, including the structural design and implementation of earth stations in Panama, Iran, Lebanon, Brazil, and the Comsat stations at Brewster, Andover and Paumalu. He was responsible for the structural/mechancial design of earth stations in Australia, Thailand and the Philippines, as well as West Coast tracking stations for the U.S. Navy.

In the intricate area of shock and vibration isolation and electronics equipment packaging in shelters, Mr. Vlissides has solved difficult problems for Page Communications Engineers at OGDEN Laboratories involving the MRC-113 U.S. Air Force Program.

Mr. Vlissides participated in the analysis, design and implementation of large microwave and troposcatter communications programs, including the multimillion dollar IWCS in

Vietnam, the Iranian Microwave (INTS), the NATO Bypass, and the Hongkong-Taiwan-Philippines tropo system. The major areas of involvement covered feasibility studies, advance survey details, civil-mechanical and electrical designs, and final implementation.

Mr. Vlissides was heavily involved in the design and construction of the VOA antenna and tower systems in VOA Kavala, Greece; Rhodes, Greece; and Liberia, Africa.

He has extensive experience in the design of structures using non-conventional materials as plastics, non-metallic filaments, glass filaments, etc.

In the area of multi-leveled guyed towers, Mr. Vlissides expanded a computer program able to handle guyed towers of up to 20 guy levels, and carrying concentrated loads and a top electronic umbrella with up to 36' long radials. The tower is treated as a beam-column on elastic supports with all secondary effects taken into consideration. Recently, Mr. Vlissides has developed a computerized design of a family of self-supporting and guyed microwave towers, covering a range of heights from 20-foot stub antenna mounts to 500-foot applicable and very economical for large communication projects.

Mr. Vlissides, In addition, has extensive experience in building structural analysis and design, such as highrise office and apartment buildings, hospitals, churches, communications buildings, etc.

Earlier, Mr. Vlissides was employed as a Structural Engineer by the U.S. Navy Department, Bureau of Yards and Docks, where he was responsible for the development of BUDOCKS criteria and standards and the design of structures for antennas and other communication facilities, and was heavily involved in the Nord Antenna and West Pac Australia Antenna Projects. In a previous position with the District of Columbia Highway Department, Bridge Division, he was field engineer for the D.C. approaches of the Theodore Roosevelt Bridge. Prior to this, he was involved in the engineering, administration, design and construction supervision of Public Works for the Greek Government.

Mr. Vlissides' professional affiliations include:

Association of Federal Communications Consulting Engineers

American Society of Civil Engineers, Fellow National Society of Professional Engineers American Concrete Institute Professional Engineer - District of Columbia - #5949 Professional Engineer - New York - #044849 Professional Engineer - Maine - #2639 Professional Engineer - Maryland - #7868

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Professional Engineer - Virginia - #05782
Professional Engineer - Pennsylvania - #20621.E
Professional Engineer - Illinois - #62-32261
Professional Engineer - New Jersey - #12618
Professional Engineer - Kentucky - #11506
Professional Engineer - Alabama - #15408
Professional Engineer - Arizona - #19057
Professional Engineer - Arkansas - #6273
Professional Engineer - Colorado - #23862
Professional Engineer - Connecticut - #14015
Professional Engineer - Delaware - #6957
Professional Engineer - Florida - #0036341
Professional Engineer - Georgia - #15453
Professional Engineer - Idaho - #5272
Professional Engineer - Indiana - #ENE8600628
Professional Engineer - Iowa - #10765 (Retired)
Professional Engineer - Kansas - #10337
Professional Engineer - Massachusetts - #32444
Professional Engineer - Michigan - #31880
Professional Engineer - Minnesota - #17485
Professional Engineer - Mississippi - #9591
Professional Engineer - Missouri - #E-21442
Professional Engineer - Nebraska - #E-6055
Professional Engineer - Nevada - #7162
Professional Engineer - New Hampshire - #6347
Professional Engineer - Wyoming - #5096
Professional Engineer - Ohio - #E-49967
Professional Engineer - Oregon - #13,133
Professional Engineer - Rhode Island - #4832
Professional Engineer - South Carolina - #10437
Professional Engineer - Utah - #7425
Professional Engineer - Vermont - #5193
Professional Engineer - Wisconsin - #E-24060
Professional Engineer - New Mexico - #9598
Professional Engineer - Louisiana - #22119
Professional Engineer - North Carolina - #12902
Professional Engineer - South Dakota - #4222
Professional Engineer - Montana - #ENG08785
Professional Engineer - North Dakota - #PE-3023
Professional Engineer - Washington - #23117
Professional Engineer - Oklahoma - #14540
Professional Engineer - West Virginia - #9901
Professional Engineer - Tennessee - #17,990
Professional Engineer - California - #C 040249
Professional Engineer - Texas - #59573
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Certificate of Qualification by the National Engineering Examiners, No. 4003.

Tau Beta Pi Honorary Engineering Society Certified Fallout Analyst and Protective Construction Analyst, DOD - 2TT0318865

Electronics Industries, Association, TR-34.2 Subcommittee on Earth Station Antennas. TR 14.7 Tower Committee on Communication Towers

Mr. Vlissides' major recent studies and prototype designs include:

Large Tracking Antenna Tower & Foundation Analysis & Design Consideration (July 1968)

Large Tracking Antenna Building & Foundation Earthquake Analysis & Design Considerations (July 1968)

Application of Fiberglass/Plastic to transportable communications systems.

High-gain Antennas Surface Geometry Determination (January 1968)

Optimum Antenna Design for Synchronous Communications Satellites (January 1970)

Original Design of 32-foot Transportable or Fixed Tracking Antennas (April 1971)

Participation in the preparation of Earth Station Antenna Standards for the Electronics Industries Association (EIA) (1969-1971)

Effective low cost methods for equipment shock and vibration isolation (June 1971)

Design of an experimental multibeam antenna system of satellite communications (1971-1972) Comsat Corporation

Analysis, Design & Fabrication Supervision of the Sectionalized Loran-C Transmitting Antenna for Cosmos Engineers, Inc. and the U.S. Coast Guard (1972-1973)

Tall guyed towers with provision of a broken guy condition and secure and easy access to the tower elevator landing directly from the transmitter building. Various applications at WBNS-TV, WJXT-TV, WBTV, WCBD, WXFL-TV and Hill Tower, Inc.

Mr. Vlissides has a B.S. Degree from the Athens, Greece Military Academy; B.C.E. and M.C.E. in Structural Mechanics from the Catholic University of America, where he has been a Doctoral Candidate in Structural Mechanics and Dynamics.

His language capabilities include English and Greek.



COMPUTER STRUCTURAL ANALYSIS

& ENGINEERING EVALUATION

OF THE

666 FT. GUYED TOWER

CATONSVILLE, MARYLAND

2ND REVISION

FEBRUARY 1992

FOR SCRIPPS HOWARD BROADCASTING COMPANY

BY
VLISSIDES ENTERPRISES, INC.
7601 BURFORD DRIVE
McLEAN, VIRGINIA 22102
(703) 356-9504

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SECTION A

INTRODUCTION

The subject structure is a 666 ft. guyed tower located in Catonsville, Maryland (Coordinates: 39° 17′ 13"; 76° 45′ 16"). The tower has a triangular cross-section with a face width of 4 ft. It is supported on a hinged base with seven guy levels of three guys each. The tower was designed and manufactured by Utility Tower Company in 1969.

The purpose of this analysis is to investigate the structural capability of the tower to support the Channel 2 TV antenna on top and its one 3-1/8" transmission line, in addition to the existing antennas and transmission lines.

The following assumptions have been made regarding the major characteristics of the structural system employed in the design of the subject tower:

- a) Section panels were assumed to be approximately 5 ft. in height.
- b) The tower span lengths were estimated to be 93.5 ft., 95.2 ft., 95.2 ft., 95.2 ft., 94.5 ft., 95.2 ft. and 94.4 ft. for Spans #1 through #7 respectively.
- c) The inner and outer guy anchors were estimated to be at 262 ft. and 402 ft. distances from the tower respectively.
- d) The guy cables are E.H.S. cables with estimated diameters of 5/8", 5/8", 3/4", 5/8", 3/4", 7/8" and 1" for guy levels #1 through #7 respectively.

e) The tower legs were assumed to be of 3.5" O.D. with 0.300" wall thickness in the bottom 500 ft. of the tower and 0.216" wall thickness from 500 ft. to top.
 f) All the diagonal members were assumed to be solid

